

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. MAGUIRE
CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ZAIRE D. JONES and
REBECCA A. ALLARD,

Defendants.

CASE NO. *2:21-cr-186*

JUDGE *SARGUS*

INDICTMENT

18 U.S.C. §§ 922(a)(6) & 2(a)
18 U.S.C. § 922(n)
18 U.S.C. § 924(a)(1)-(2)

THE GRAND JURY CHARGES:

COUNT 1

(False Statement During Purchase of a Firearm)

On or about September 10, 2021, in the Southern District of Ohio, the defendant, **REBECCA A. ALLARD**, in connection with the acquisition of a firearm, specifically, a Century Arms, Draco model 7.62 semi-automatic pistol, bearing serial number 21DF-8664, from Vance Outdoors, a Federally Licensed Firearms Dealer, within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vance Outdoors, which statement was intended and likely to deceive Vance Outdoors as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that she was the actual transferee/buyer of the firearm when, in fact, she was purchasing it on behalf of **ZAIRE D. JONES**.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 2

(Aiding and Abetting False Statement During Purchase of a Firearm)

On or about September 10, 2021, in the Southern District of Ohio, the defendant, **ZAIRE D. JONES**, did knowingly aid, abet, counsel, command, induce, and procure the commission of an offense against the United States—to wit: the knowing provision of a false and fictitious written statement by REBECCA A. ALLARD to Vance Outdoors, a Federally Licensed Firearms Dealer, within the meaning of Chapter 44, Title 18, in connection with the acquisition of a firearm, specifically, a Century Arms, Draco model 7.62 semi-automatic pistol, bearing serial number 21DF-8864, which statement was intended and likely to deceive Vance Outdoors as to a fact material to the lawfulness of such sale of said firearm to ALLARD under Chapter 44, of Title 18, in that ALLARD represented that she was the actual transferee/buyer of the firearm when, in fact, she was purchasing it on behalf of the defendant.

In violation of Title 18, United States Code, Sections 922(a)(6), 2(a), and 924(a)(2).

COUNT 3

(Receipt of a Firearm by a Prohibited Person)

On or about September 10, 2021, in the Southern District of Ohio, the defendant, **ZAIRE D. JONES**, who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: Improper Handling of a Firearm, a felony of the fourth degree, in Franklin County Court of Common Pleas Case Number 20-CR-4956, did willfully receive a firearm, specifically, a Century Arms, Draco model 7.62 semi-automatic pistol, bearing serial number 21DF-8664, said firearm having been shipped and transported in interstate and foreign commerce, and the defendant knew that he was then under indictment for a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

FORFEITURE ALLEGATION

1. The allegations of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America under 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of one or more of the offenses alleged in the Indictment, the defendants, **ZAIRE D. JONES** and **REBECCA A. ALLARD**, shall forfeit to the United States all firearms and ammunition involved in the such offenses, specifically: a Century Arms, Draco model 7.62 semi-automatic pistol, bearing serial number 21DF-8664, and any associated ammunition.

Forfeiture pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

s/ Foreperson
Foreperson

VIPAL J. PATEL
ACTING UNITED STATES ATTORNEY



NOAH R. LITTON (0090479)
Assistant United States Attorney